

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DOUGLAS EL	:	CIVIL ACTION
	:	
Plaintiff	:	
v.	:	No. 02CV3591
	:	
SOUTHEASTERN PENNSYLVANIA	:	JURY TRIAL DEMAND
TRANSPORTATION AUTHORITY	:	
	:	
Defendant.	:	

SEPTA'S MOTION FOR A PROTECTIVE ORDER
AND FOR DISCOVERY SANCTIONS

Southeastern Transportation Authority (“SEPTA”), hereby moves the Court for a Protective Order and Discovery Sanctions pursuant to Rules 26(c) and 37(a)(4) of the Federal Rules of Civil Procedure for the reasons more fully set forth in its accompanying memorandum of law.

Respectfully submitted,

Robert J. Haurin
SAUL H. KRENZEL & ASSOCIATES
42 South 15th Street, Suite 800
Philadelphia, PA 19102
(215) 977-7230

Dated: May 20, 2004

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DOUGLAS EL	:	CIVIL ACTION
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	:	
Defendant.	:	

ORDER

AND NOW, this _____ day of _____, 2004, upon consideration of SEPTA's Motion for a Protective Order and for Discovery Sanctions (the "Motion") and supporting memorandum of law thereto, and any responses thereto, it is hereby ORDERED that the Motion is GRANTED. SEPTA shall not be required to answer any discovery propounded by Plaintiff after March 15, 2004. SEPTA shall submit to the Court a summary of its costs and attorneys' fees incurred in bringing the Motion within ten (10) days of the date of this ORDER.

BY THE COURT:

J.

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	:	
Defendant.	:	

CERTIFICATION OF COUNSEL

I, Robert J. Haurin, Esquire certify to this Court that the parties were unable to resolve this dispute without the intervention of the Court. Specifically, I wrote to counsel for Plaintiff several times and asked that the discovery at issue in this motion be withdrawn. I have never received any response to my requests from counsel for Plaintiff.

Respectfully submitted,

Robert J. Haurin
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